

FILED

2018 MAY 22 AM 11:18

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAPHNA J. GOREN,

Defendant.

) INFORMATION

)

)

)

)

)

)

)

)

)

CASE NO.

**1:18 CR 244**

Title 18, Sections 641 and  
1344(2), United States Code

**JUDGE ADAMS**

COUNT 1

(Theft of Government Property, in violation of 18 U.S.C. § 641)

The United States Attorney charges:

1. From in or around August 2011 and continuing until in or around December 2014, in the Northern District of Ohio, Eastern Division, Defendant DAPHNA J. GOREN, in a continuing course of conduct, willfully and knowingly did steal, purloin and convert to her own use, and without authority dispose of property of the United States exceeding \$1,000.00 in value belonging to the United States Social Security Administration, an agency of the United States, to wit: Social Security Title II Retirement and Survivors Insurance in the amount of approximately \$91,403.00, all in violation of Title 18, Section 641, United States Code.

COUNT 2

(Bank Fraud, in violation of 18 U.S.C. § 1344(2))

The United States Attorney further charges:

2. At all times material to this count, Key Bank was a financial institution with deposits insured by the Federal Deposit Insurance Corporation.

3. From in or around August 2011 and continuing until in or around November 2012, in the Northern District of Ohio, Eastern Division, Defendant DAPHNA J. GOREN knowingly executed and attempted to execute a scheme to obtain money, funds, credits, assets, securities or other property under the custody or control of Key Bank by means of false and fraudulent, representations, and promises.

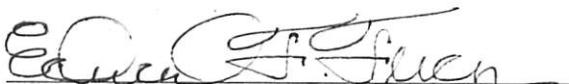
4. As part of her scheme and artifice, Defendant obtained seventeen (17) checks, totaling approximately \$17,407.69, addressed and made payable to H.G., from Teachers Insurance and Annuity Association-College Retirement Equities Fund ("TIAA-CREF").

5. As a further part of her scheme and artifice, Defendant fraudulently endorsed said seventeen (17) checks by forging H.G.'s signature on the checks and deposited the checks into a checking account maintained at Key Bank with account number ending in 4259. By depositing the seventeen (17) checks from TIAA-CREF, Defendant falsely represented that H.G. endorsed the checks and that GOREN was entitled to funds represented by the checks. Defendant subsequently withdrew the funds from the custody or control of Key Bank, knowing that she fraudulently represented that H.G.'s endorsed the checks and that Defendant was not entitled to the funds.

6. As a result of her scheme and artifice, Defendant unlawfully obtained approximately \$17,407.69 from the custody or control of Key Bank by means of false and fraudulent, representations, and promises.

All in violation of Title 18, United States Code, Section 1344(2).

JUSTIN E. HERDMAN  
United States Attorney

By:   
EDWARD F. FERAN  
Chief, General Crimes Unit